

Appl. No. 10/710,512  
Response dated 6/1/2006  
Reply to Office Action of 3/1/2006

### REMARKS/ARGUMENTS

#### **Claim remarks with regards to 35 U.S.C. §103**

The Examiner has rejected claims 34-48 under 35 U.S.C. §103 as being unpatentable over Ambrose (6,595,704) in view of Iwai et al., (20050185049).

Applicant has amended the independent claims 34, 39 and 44 to clarify the definition of roll axis. Neither cited reference contemplates cameras rotated in the same axis as defined by Applicant and as Applicant has claimed. Hence, the Ambrose '704 reference respectfully cannot possibly rotate its cameras in the same manner as Applicant's invention and as such Ambrose '704 is respectfully rendered moot. Since all claim limitations are not taught by the references as per MPEP 2143.03, the obviousness rejection is respectfully no longer applicable. Specifically, with regard to Applicant's claimed invention, see Figs. 1B and 8, noting that Ambrose does not comprise "a camera mount coupled with said first camera and said second camera wherein said camera mount is rotated in a first axial angle between 0 and 90 degrees about a roll axis defined as perpendicular to a plane in which said first camera and said second camera are mounted coplanar in". With respect to the limitations disclosed in Ambrose '704, the two eye-ball like cameras in Fig. 9, are never rotated about a roll axis defined as perpendicular to a plane in which said first camera and said second camera are mounted in (i.e., perpendicular to the plane formed by lines T and V as per Fig. 9), rather the cameras rotate about the yaw axis (rotate about a vertically pointing axis 94 for example, i.e., the head turns left & right in Fig. 11) or rotate about the pitch axis (rotate about an axis defined between the two cameras, i.e., the head bobs up and down in Fig. 11 for example).

Applicant has also amended 38, 43 and 48 to clarify the definition of pitch axis. Applicant maintains that Ambrose use of roll axis is non-standard and as such the amendments to the claims are for clarification only and not to avoid Ambrose. Specifically, the Examiner's cited reference Tritchew et al., '223 Fig. 1a, shows the standard notations for axes, yaw, pitch and roll that are not utilized in a standard way in Ambrose. Ambrose's unfortunate unilateral definition of roll contrary to scientific and engineering standards forces clarification in this case, however Applicant maintains that the true roll axis rotation limitations claimed are not found in

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any reference cited by the Examiner and as such clarification amendments do not constitute estoppel or any limitation to equivalents in the future. In order to expedite examination, the Tritchew et al., '223 is addressed further. Specifically, the stabilizer of Tritchew et al., is intended to keep a camera from rolling through the roll axis (and other axes) for example when the camera mount is mounted on a plane. It is not the intent of Tritchew et al., or any known camera mount to stabilize cameras at a cocked angle as the viewing audience would find this disagreeable.

The Examiner has stated that "official notice that joints capable of rotating to angles between 0 and 90 degrees were common and notoriously well known in the art at the time of the invention" is respectfully irrelevant since Applicant does not claim a "joint".

The Examiner's use of Iwai '049 shows that Applicant's invention is not obvious as per Fig. 3 where distance calculations to the primarily vertical and horizontal lines of the image will in general contain many errors if distance calculations were performed to a feature found along an epipolar line parallel to said collinear horizontal center lines of the cameras. This is the case since for a given distance calculation to a particular feature the pixel starting a feature may not be clear since the features in Fig. 3 are parallel to the epipolar lines. (Also see Applicant's Fig. 4 and Paragraphs [0027] through [0029]). In other words, it would be far easier to calculate distance to a general point if cameras 1 and 2 in Fig. 1 were mounted coplanar on a mount that was rotated in a first axial angle between 0 and 90 degrees about a roll axis defined as perpendicular to a plane in which said first camera and said second camera are mounted. (Which would correspond to Applicant's Fig. 6 and Paragraphs [0030] and [0031]). Since Iwai does not contemplate rotating the cameras through roll for distance calculations in any manner, it consequently cannot be used in any manner related to motivation to combine references to form the type of distance calculations specified and claimed by Applicant.

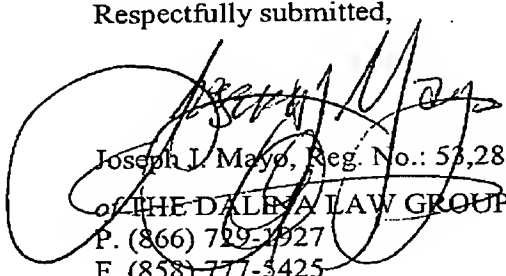
## CONCLUSION

As all rejections have been answered by Applicant and since the claims are not anticipated or rendered obvious by the references supplied by the Examiner, Applicant respectfully submits that the claims are in condition for allowance. If the Examiner differs in

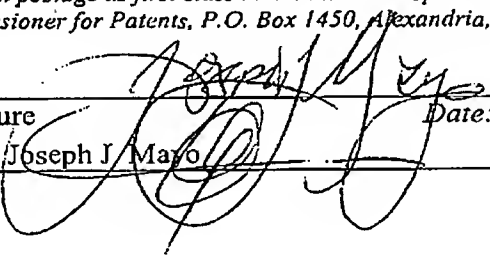
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this conclusion, the Examiner is hereby requested to contact Applicant's representative for purposes of a telephone interview at the number listed below before any action (other than an allowance) is initiated.

Respectfully submitted,



Joseph J. Mayo, Reg. No.: 58,288  
of THE DALINA LAW GROUP, P.C.  
P. (866) 729-1927  
F. (858) 777-5425

Correspondence Info:	<b>CERTIFICATE OF MAILING or TRANSMISSION</b>
Customer Number  <b>36067</b>	<i>I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office on <u>June 1, 2006</u> to 571-273-8300 or is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.</i>
	Signature  Date: June 1, 2006
	Name: Joseph J. Mayo